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January 22, 2021

VIA ELECTRONIC FILING

Hon. Andrew T. Baxter
U.S. Magistrate Judge
U.S. District Court, Northern District of New York
Federal Building and U.S. Courthouse
P.O. Box 7396
Syracuse, New York 13261-7396

**Re: *John Doe v. Skidmore College*
*Case No. 1:20-cv-00008 (LEK/ATB)***

Dear Judge Baxter:

As you know, our firm represents Defendant Skidmore College in the above-referenced matter. I am writing to request an extension of the remaining deadlines set forth in Your Honor's Pretrial Scheduling Order.

Defendant is in the process of retaining two expert witnesses and completing expert disclosures to respond to Plaintiff's two experts who were disclosed on December 30, 2020. In addition, both parties are continuing to respond to outstanding paper discovery demands. Once paper discovery is complete, Defendant intends to depose Plaintiff, Plaintiff's two experts, and possibly 1-2 non-parties whom Plaintiff identified in his initial disclosures. Defendant expects that Plaintiff will seek to depose at least two representatives of the College.

Accordingly, Defendant requests that the remaining deadlines be extended by an additional thirty (30) days as follows:

	Current Due Date	New Due Date
Defendant's expert disclosure	2/17/2021	3/19/2021
Rebuttal disclosures	3/5/2021	4/5/2021
Discovery cutoff	3/31/2021	4/30/2021
Substantive motions	5/17/2021	6/16/2021

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I have conferred with Plaintiff's counsel and she consents to this thirty (30) day extension of the remaining deadlines.

Thank you for your consideration in this matter.

Respectfully submitted,

Very truly yours,

BOND, SCHOENECK & KING, PLLC

s/Robert F. Manfredo
Robert F. Manfredo, Esq.
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